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Attorneys for Defendant Kan Pacific Saipan, Ltd. dba Mariana Resort and Spa

UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

) CIVIL CASE NO. 08-00008
) NOTICE OF MOTION AND MOTION TO) COMPEL
)
))))
, 2008, at the hour ofm.,

defendant Kan Pacific Saipan, Ltd. shall move pursuant to FRCP 37(a)(1) for an order compelling plaintiff Koichi Taniguchi to respond to a Request for Production, as more fully described in the accompanying Declaration of Tim Roberts. This motion is based upon this notice of motion and motion, the accompanying Memorandum of Points and Authorities, the accompanying Declaration

of Tim Roberts, all documents and pleadings on file in this action, and such further argument or evidence as may be presented at the hearing on this motion.

DOOLEY ROBERTS & FOWLER LLP

Date: 7.2.8

By:

TIM ROBERTS, ESQ.

Attorneys for Defendant Kan Pacific Saipan, Ltd. dba Mariana Resort and Spa